IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO WESTERN DIVISION

ENVIRONMENT AMERICA, D/B/A ENVIRONMENT OHIO, AND LAKE ERIE WATERKEEPER,

Civil No. 3:24-cv-00515

Plaintiffs,

v.

Judge Jack Zouhary

CAMPBELL SOUP SUPPLY COMPANY L.L.C.,

Defendant.

UNITED STATES OF AMERICA,

Plaintiff,

Civil No. 3:24-cv-00523

v.

Judge Jack Zouhary

CAMPBELL SOUP SUPPLY COMPANY, L.L.C.,

Defendant.

JOINT STATUS REPORT

Pursuant to the Court's Order directing the Parties to submit a status report by September 13, ECF No. 17, the Parties hereby submit this Joint Status Report to apprise the Court of recent developments and propose a continued stay of proceedings.

The Parties report that they completed a site-visit on August 26-27, 2024, which included technical discussions, and held a settlement discussion on September 11, 2024. The Parties still need to hold additional necessary technical discussions, the first of which is scheduled for September 18,2024, and still need to engage meaningfully regarding a penalty settlement figure the United States proposed on July 2, 2024, in which the citizen group Plaintiffs joined.

The Parties remain motivated to resolve the claims in the Complaints filed in this matter without litigation and believe they would benefit from an additional four weeks to pursue a negotiated resolution.

The Parties therefore respectfully request that the Court leave the stay of proceedings in place until October 11, 2024, upon which date the Parties shall submit a further status report.

Respectfully submitted this 13th day of September, 2024,

FOR PLAINTIFFS

FOR THE UNITED STATES OF AMERICA:

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/s/ Lila C. Jones

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